



Wyoming Department of Agriculture

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Dave Freudenthal, Governor

John Etchepare, Director

April 28, 2005

Tom Christiansen
Sage Grouse Program Coordinator
Wyoming Game and Fish Department
351 Astle Ave.
Green River, WY 82935

Dear Mr. Christiansen:

Following are the comments from the Wyoming Department of Agriculture (WDA) on the document titled "Enhancing Sage Grouse Habitat...A Wyoming Guide."

Our comments are specific to our mission within state government: to be dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life of our citizens. We believe it's important we are kept informed of proposed actions and decisions, and continue to be provided the opportunity to express pertinent issues and concerns.

The WDA supports the Wyoming Game and Fish Department (WGFD) for their efforts on the sage grouse working groups, collaboration with other states and agencies, and most recently the draft publication of "Enhancing Sage Grouse Habitat...A Wyoming Guide."

The "guide" from our understanding is a stand-alone document to be used to assist landowners, land managers, conservation organizations and others who may have an interest in sage grouse habitat conservation. It is beneficial to have a condensed, neatly organized, easy-to-read document for layman readers. We have several suggestions for the guide before it is finalized, including format, management recommendations, livestock grazing, contacts, and general comments.

Format

Many of the readers will be private landowners. These landowners are interested in conservation and rangeland rehabilitation, but are self-directed individuals. The guide should be written in that type of format to reflect those individuals who have the ability and willingness to work on a conservation plan for sage grouse on their own. A large majority of the research to re-establish sage grouse populations is trial and error with un-documented results. Additionally, agency personnel are spread too thin to assist all the individuals who would need personal consultation. Therefore, we recommend the WGFD take a different approach to this document to be more self-directed.

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The guide should be created to be a step-by-step colored brochure on how to improve rangeland conditions that not only benefit sage grouse, but all wildlife and domestic livestock that use the sagebrush steppe. The guide should include photographs of examples of all aspects of rangeland rehabilitation. The publication titled "Sagebrush of Colorado, taxonomy, distribution, ecology, & management" by Alma H. Winward and distributed by the Colorado Division of Wildlife is an excellent example of how a publication can utilize photographs and text to allow an individual to self-teach and direct.

The guide should include photographs to go with the text's publication. Examples could include a comparison of ideal and poor habitat locations, before and after sage treatment methods, varieties of grasses, forbes, and sage, as well as varieties of insects a sage grouse might eat.

Management Recommendations

The guide has a number of questions under the Management Recommendations section. These questions are legitimate and are critical for a landowner to review before making land management decisions. However, many of the questions asked in the guide simply lack a direction or answer for the landowner.

One question is, "Have birds on leks decreased or disappeared?" Landowners may be calving on different areas of the ranch than where sage grouse leks are located during early April and they may not be aware of present lek locations. The guide could assist landowners of what to count, when to count, and have something to compare to that would signify if their populations are sound.

Another question the guide asks is, "Are there enough insects and forbs available for broods?" There is a clear need for a healthy insect population for brood rearing, but it still remains unclear of how many insects there should be for a given area. A landowner is not going to have an understanding of what a high, medium, or low insect population might be.

Finally, another question asks "Is the sagebrush canopy cover too thick, too sparse, too low, or too tall?" This clearly depends on the type of sagebrush a landowner has on their property. The guide would be more beneficial to use similar photographs and text as the Sagebrush of Colorado publication to assist with this. Many landowners may not know the varieties of sagebrush or their growth patterns, but the guide can teach them. In general, we want the guide to discourage landowners from feeling obligated to create habitat for all sage grouse life cycles. Not every large expanse of rangeland will have a lek, nesting sites, brood rearing habitat, or winter range.

Livestock Grazing

The use of livestock in grazing and managing for sage grouse and their habitat is a critical component to the success of improving the sage grouse environment and keeping the birds off the endangered species list. The guide could be much more specific in livestock grazing management. The Wyoming Rangeland Monitoring Guide—A Cooperative and Voluntary Approach to Monitoring Rangelands, August 2001, would be an ideal publication to use by the WGFD to assist in this section. The section titled "Grazing Use Map" educates landowners about using livestock utilization maps to identify key areas, distribution problems, or management

opportunities. The sage grouse guide would like rangelands to have a residual of 1 – 4%. It is critically important the guide tells HOW to achieve, and HOW to calculate 1 – 4% residual.

Livestock grazing will beneficially change the seral stages of plant communities on all lands including federal, state, and private. Livestock producers can learn new and creative methods of grazing to not only help them increase their profitability, but also improve sage grouse habitat. The guide should also emphasize the importance of livestock grazing to enhance sage grouse environment. Examples could include improved seed to soil contact, additional organic matter, and increased insect populations for sage grouse chicks.

Contacts

The guide should be used as an educational manual for all who are interested in working to improve sage grouse habitat. There is a definitive need for this guide to promote the state sage grouse working groups, Natural Resource Conservation Service, conservation districts, and others who can work with landowners on a private basis if needed. There should be a section to this guide that includes all the names of people or agencies willing to help landowners in their conservation endeavors.

General Comments

A comment made at the NRCS sage grouse training in Casper from Matt Hollaran, University of Wyoming doctoral student, that the guide should increase the sagebrush canopy from 10 – 15% to 20 – 25%. Some lands will exceed this and need to be thinned. According to your document, 2-4 D should not be used any longer due to a reduction in forbs. There should be scientific research trials done on the timing of this herbicide to see if an application could be made in the fall or early spring, around the time when forbs have ended their cycle or not yet begun. Economically, landowners are going to seek the cheapest way of controlling sagebrush. Fire should strongly be encouraged to treat sagebrush. Wildfires have routinely been stopped early in order to stop burning large amounts of land. We disagree with wildfires being suppressed too early unless people or structures are in danger. It seems the sagebrush stands are decadent due to the lack of wildfires being able to burn naturally.

The guide has a section on insecticides and the encouragement to reduce their uses. We question how much insecticides are being applied in the sage grouse habitats. Sage grouse are not found in row crops such as corn, sugar beets, or wheat where insecticides may be applied. Therefore, unless there is validation of sage grouse being located in these fields, insecticides should not be addressed as a cause for reduced grouse numbers.

The reduced number of young raised is a deciding factor whether there is a population increase or decrease the following spring. The guide should emphasize the need to increase brood sizes and success rates. There are a number of factors including predation that should be addressed. The guide briefly discusses predator control and methods to reduce them. An expansion of how different predators affect the different lifecycles of the sage grouse. For example, skunks might eat the eggs, fox might eat the chicks, and eagles might eat the adults. Photographs of the fences with additions to reduce predator birds from perching near watering holes would be good to include.

As a final statement, we believe there is a need for agencies to gain the respect and trust of private landowners. The landowners are going to play a critical role in the monitoring and stabilization of the sage grouse populations in the state of Wyoming and across the West. There is a lot of missing data for leks, brood counts, etc. that the landowners could obtain. However, without good working relationships with state, federal, and local agencies, this information will not be shared with a fear of it being used negatively against them. These relationships could be strengthened and the document widely used if workshops and classes were offered to supplement this guide and teach landowners about all the ways they could assist in range improvements and wildlife conservation.

The sage grouse working groups have been ideal models for creating strong working relationships. The groups have individually come up with recommendations for their area and for the state. We would highly recommend the guide to include the findings as part of this document. This addition could initiate further studies, enhance existing ones, or just create a new ideas for increasing sage grouse populations.

We believe there is a lot of potential for the guide to be used with a certain amount of changes to reflect the needs of federal, state, and private landowners.

Thank you for the opportunity to comment.

Sincerely,



John Etchepare
Director

JE/jw

Cc: Governor's Planning Office
Wyoming Stock Growers Association
Wyoming Wool Growers Association
Rocky Mountain Farmers Union
Wyoming Association of Conservation Districts
Wyoming Farm Bureau Federation
Wyoming State Grazing Board